

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

KIERAN RAVI BHATTACHARYA)	
)	
)	
Plaintiff,)	
)	
v.)	
)	
JAMES B. MURRAY, JR., et. al.,)	Civil Action No.: 3:19-CV-00054
)	
)	
Defendants.)	
)	

**MOTION TO SEAL EXHIBITS C, D, E, J, K, M, AND N TO
PLAINTIFF'S OPPOSITION TO
THE UVA DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Plaintiff Kieran Ravi Bhattacharya (“Mr. Bhattacharya”), by counsel, respectfully moves to seal Exhibits C, D, E, J, K, M, and N to Plaintiff’s Opposition to the UVA Defendants’ Motion for Protective Order (Dkt. #368). These exhibits, some of which were subpoenaed from current or former students at UVA Med School, have been or potentially could be designated as confidential pursuant to the Stipulated Protective Order entered in this matter (Dkt #150), which by its terms limits access to highly confidential documents to attorneys, attorneys’ clerical employees and support staff, experts, witnesses, court personnel or others only upon two-party consent. *See* Stipulated Protective Order (Dkt #150) at 8-9. Sealing is requested indefinitely, due to the sensitive nature of these exhibits and the requirements of the Stipulated Protective Order entered by this Court.

Date: April 20, 2022

Respectfully submitted,

KIERAN RAVI BHATTACHARYA

By: s/ Michael J. Lockerby
Counsel

Michael J. Lockerby (VSB No. 24003)
FOLEY & LARDNER LLP
Washington Harbour
3000 K Street, N.W., Suite 600
Washington, D.C. 20007-5109
Telephone: (202) 672-5300
Facsimile: (202) 672-5399
Email: mlockerby@foley.com

Steven C. Lockhart (admitted *pro hac vice*)
Robert T. Slovak (admitted *pro hac vice*)
Brandon C. Marx (admitted *pro hac vice*)
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, Texas 75201
Telephone: (214) 999-3000
Facsimile: (214) 999-4667
E-mail: slockhart@foley.com
E-mail: rslovak@foley.com
E-mail: bmarx@foley.com

John P. Melko (admitted *pro hac vice*)
James G. Munisteri (admitted *pro hac vice*)
FOLEY & LARDNER LLP
1000 Louisiana Street, Suite 2000
Houston, Texas 77002
Telephone: (713) 276-5500
Facsimile: (713) 276-5555
Email: jmelko@foley.com
E-mail: jmunisteri@foley.com

Counsel for Plaintiff, Kieran Ravi Bhattacharya